LAW OFFICES OF

## TACOPINA SEIGEL & TURANO

A PROFESSIONAL CORPORATION

275 MADISON AVENUE 35TH FLOOR

NEW YORK, NEW YORK 10016

TELEPHONE (212) 227-8877 FACSIMILE (212) 619-1028 WWW.TACOPINALAW.COM

MILAN OFFICE: 20149 MILANO VIA DOMENICHINO, N. 35 MILAN, ITALY TEL (02) 48012455

NEW JERSEY OFFICE: 60 PARK PLACE SUITE 703-704 NEWARK, NEW JERSEY 07102

JOSEPH TACOPINA CHAD D. SEIGEL+ STEPHEN TURANO MATTHEW G. DEOREO^ DINA NESHEIWAT\*

GEORGE VOMVOLAKIS FRANCESCO PENTA \*\*\* VICTOR SHERMAN+

- ALSO ADMITTED IN NEW JERSEY
- ALSO ADMITTED IN CONNECTICUT ALSO ADMITTED IN CALIFORNIA
- ALSO ADMITTED IN FLORIDA

\*\*\*ONLY ADMITTED IN ITALY

August 1, 2013

Hon. Dora L. Irizarry, U.S.D.J. United States District Court EDNY 225 Cadman Plaza East Brooklyn, NY 11201

> United States v. Anthony Gatt Re:

> > Docket No. 11-CR-486

Your Honor:

The defense respectfully submits this letter on behalf of defendant Anthony Gatt to request, with the consent of the Government and Pretrial Services, that Mr. Gatt be permitted to travel on vacation with his fiancé, Leonida Duraku, to Orlando, Florida from August 28th until September 3<sup>rd</sup> of 2013.

By way of background, Mr. Gatt, was released on July 29, 2011, on a \$700,000 personal recognizance bond, secured by his mother's residence, and with his travel restricted to the Southern and Eastern Districts of New York.

If permitted to travel, Mr. Gatt and his fiance intend on staying at a Sheraton Hotel located in Orlando, Florida. Because Mr. Gatt used the Travelocity website to reserve potential travel accommodations the exact Sheraton Hotel address at which he and his fiancé will be staying is not yet available.

Notably, defense counsel has spoken with AUSA Steven Tischione who advised that the Government consents to this request. And, Officer Lourdes Vasquez also advised defense counsel that Pretrial Services similarly consents to it. Lastly, we note that Mr. Gatt has been fully compliant with the terms of his release to date.

## TACOPINA SEIGEL & TURANO, P.C.

Hon. Dora L. Irizarry August 1, 2013 Page - 2-

For the reasons set forth above, the defense respectfully requests that Mr. Gatt be permitted to travel to Florida from August 28<sup>th</sup> to September 3<sup>rd</sup> of 2013.

Your consideration in this matter is greatly appreciated.

Respectfully submitted,

Joseph Tacopina

cc: AUSA Steven Tischione via ECF

Officer Lourdes Vazquez via facsimile 718-613-2568